

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48909

DAVID F. HALES, Director

July 20, 1989

Ms. Valerie Kitchen, City Clerk
City of Ferndale
300 East Nine Mile Road
Ferndale, Michigan 48220

Dear Ms. Kitchen:

SUBJECT: Reichhold Chemicals Closure Plan
MID 087 738 431

Director Hales has asked me to respond to your letter dated June 28, 1989, regarding the Reichhold Chemicals, Inc., hazardous waste closure plan.

Thank you for your interest in the closure of this hazardous waste management facility in your community. Public involvement in the management of hazardous wastes is essential to protecting human health and the environment. The information that was submitted to the Department at the public hearing will help us to thoroughly investigate this site and ensure that this site will be properly managed, as provided by Michigan's Hazardous Waste Management Act.

An operating license for Reichhold Chemicals hazardous waste container and tank storage areas was called in by Michigan Department of Natural Resources on May 6, 1988. Reichhold Chemicals decided not to seek a license and submitted a closure plan for final closure of its storage areas on September 8, 1988 as required by Michigan's Act 64 and the Resource Conservation and Recovery Act (RCRA).

Although the closure plan only covers the RCRA regulated units at the facility, closure of these units does not release the facility from its responsibilities under the RCRA Hazardous and Solid Waste Amendments of 1984 (HSWA). All interim status facilities are subject to the corrective action requirements of HSWA. The State of Michigan has the authority to require Reichhold to remediate the facility if contamination is found.

In addition to closure of the storage areas, Reichhold Chemicals is conducting a site-wide environmental audit. MDNR will also conduct a Remedial Facility Investigation (RFI) to determine the extent of contamination and to develop a cleanup strategy.

Ms. Valerie Kitchen
July 20, 1989
Page 2

The MDNR's Remedial Facility Investigation will include interviews with ex-employees of Reichhold, interviews with Reichhold personnel, coordination with Reichhold's environmental audit, coordination within the different divisions of the DNR and a site visit. After the RFI, the DNR will provide oversight of any site cleanup that Reichhold would be required to complete.

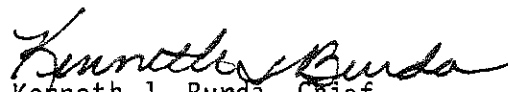
In response to the City of Ferndale's resolutions numbered 1 through 3, we have the following comments:

- 1) Failure to describe possible land uses after closure: Reichhold has included a description of future land uses in their July 3, 1989 response to comments received at the June 20, 1989 public meeting. Reichhold states that after site-wide cleanup they will attempt to sell or lease the property to industrial or commercial developers.
- 2 and 3) Will the DNR conduct an indepth investigation of the entire Reichhold facility: The DNR will conduct an in depth investigation of the entire facility, assessing the entire plant site and the surrounding area for contamination during the RFI. After the RFI has been completed MDNR will develop a plan to remediate any contamination found at the Reichhold facility.

The DNR will conduct another public hearing if sufficient information is discovered during the RFI to warrant that hearing.

Once again, thank you for your interest in the closure of the Reichhold Chemicals facility. If you have any questions, please contact Mr. Steve Blayer at 517-373-7739 or me.

Sincerely,


Kenneth J. Burda, Chief
Hazardous Waste Permits Section
Waste Management Division
517-373-0530

cc: Mr. Rich Traub, U.S. EPA - Region V ✓
Ms. Marilyn Sabadaszka, U.S. EPA - Region V
Mr. Steve Buda, WMD
Mr. Steve Blayer, WMD

MAYOR
ALBERT G. GERTLEY

CITY COUNCIL
BERNIE LENNON
PHILLIP L. POOLE
DONALD J. SAUNDERS, JR.
ROBERT J. WALDICK

CITY CLERK
VALERIE E. KITCHEN

CITY OF FERNDALE

300 EAST NINE MILE ROAD
FERNDAL, MICHIGAN 48220

TELEPHONE: (313) 546-2384

June 28, 1989



"GOOD
NEIGHBORS"

Mr. Rich Traub
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Traub:

The Ferndale City Council, at its meeting of June 26, 1989, adopted the enclosed resolution regarding the Reichhold Chemicals Closure Plan.

As City Clerk of the Council, I have been directed to advise you of this action and urge your support in this matter.

Very truly yours,

Valerie E. Kitchen
Valerie E. Kitchen
City Clerk

VEK:rh

Enclosure

RECEIVED

JUN 30 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

City of Ferndale

Resolution Regarding the Reichhold Chemicals Closure Plan

Motion by Councilman Lennon, supported by Councilman Waldick, that the following resolution be adopted:

WHEREAS, the Michigan Department of Natural Resources (MDNR) and the United States Environmental Protection Agency (U.S. E.P.A.) published a Public Notice on page 4A of the May 17, 1989 edition of the Royal Oak Daily Tribune, announcing their intent to approve the Closure Plan submitted by Reichhold Chemicals, Inc. for the corporations plant located at 601 Woodward Heights Boulevard in the City of Ferndale, the Closure Plan submitted for approval is dated September 8, 1988 and was amended on January 18, 1989; and the MDNR and U.S. E.P.A. announcing in this notice their intent to hold a public hearing at 4 Ridge Road in the City of Pleasant Ridge at 7:30 P.M. on June 20, 1989 at which "...the public is...encouraged to provide factual information concerning any known releases (date, type) of hazardous waste or hazardous waste constituents from this facility to the air, surface, water, groundwater, or soils..." and

WHEREAS, the Closure Plan submitted to the DNR and U.S. E.P.A. by Reichhold Chemicals, Inc. for approval, addresses the closure of the "Drum and Tank Storage Areas" of the company, only, and

WHEREAS, the Department of Natural Resources derives its authority to require such closure plans because of the Michigan Hazardous Waste Management Act [1979 P.A. 64 (MCLA 299.501) et seq], Title II of the United States Solid Waste Disposal Act [Public Law 89-272 (42 U.S.C. 6901 et seq)], and administrative regulations promulgated under provisions of these laws, and

WHEREAS, several individuals testified at the public hearing held on June 20, 1989 at 4 Ridge Road in the City of Pleasant Ridge, including those with personal recollection of incidents that support the conclusion that hazardous wastes or hazardous waste constituents were released from the Reichhold Chemical facility at various times and by various methods during its 62 years of operation; and including the statements of Gilbert O. Rist, a 39 year employee of the corporation, who provided specific factual information as to the probable location of remaining hazardous waste materials on the site, and who opined that the cost of properly closing this facility under 1979 P.A. 64 will significantly exceed the \$60,700.00 estimate offered by Reichhold Chemicals at Section 10.0, page 18, of the Closure Plan, and

WHEREAS, on June 21, 1989 representatives of the City of Ferndale learned from a reliable source that two or three employees and former employees, in addition to Mr. Gilbert O. Rist, were present at the June 20th hearing and intended to testify in regard to the presence of hazardous wastes at the Reichhold site, but that these individuals were presumably intimidated because of the attendance of several Reichhold officers or managers (even though these officers or managers did not identify themselves or speak during the hearing), and thus they did not testify; furthermore, that these two or three employees or former employees completed identification cards after this meeting and delivered these cards to Hearing Panel Chairman Steve Buda with a request that they be contacted privately by representatives of the DNR, and

City of Ferndale, Michigan---Resolution Regarding Reichhold Chemicals

WHEREAS, at the conclusion of this hearing, chaired by Mr. Steve Buda with members Stephen R. Blayer (Environmental Engineer), and Faye Mitchell (Environmental Quality Analyst), it was announced that written comments may be submitted to Mr. Blayer prior to July 5, 1989, for further consideration by the DNR in reaching a conclusion as to the approval of this Closure Plan, wherefore

IT IS RESOLVED, that the City of Ferndale recommends that the Department of Natural Resources and the U.S. Environmental Protection Agency NOT approve the Closure Plan submitted by the Reichhold Chemicals Inc. for the following reasons:

1. the Closure Plan is deficient in several respects, including non-compliance with section 40(1), 1979 P.A. 64, in that the closure plan as submitted does not "...At a minimum...include a description of...possible uses of the land after closure...". This omission in the Closure Plan is of grave significance to the City of Ferndale, particularly in light of the statements of Mr. Gilbert O. Rist, because the Reichhold property in question is a prime industrial parcel and thus of considerable importance as a tax revenue source, therefore if the site is in fact contaminated by hazardous wastes it may become unusable, and thus its value and the tax revenues it generates will be diminished, and

2. the testimony of those who addressed the Hearing Panel on June 20th mandates, as a minimum, that the DNR conduct an aggressive in-depth investigation to determine if in fact hazardous wastes have been secreted on the Reichhold Chemicals property in Ferndale, and if so, the nature of these hazardous wastes, their location and the steps necessary to assure the ultimate removal of such wastes before closure of this facility.

3. the Closure Plan addresses only limited geographic areas of the Reichhold Chemical complex, namely the areas east of the Grand Trunk Railroad tracks and north of Woodward Heights, designated as: "Drum Storage Area"; "Liquid Waste Boiler"; and "Tank Storage Area". The Closure Plan does not address any of the remaining manufacturing, "generation", handling, or storage areas west of the railroad tracks both north and south of Woodward Heights Boulevard; nor does the Closure Plan address any of the processing or handling areas and equipment and machinery that is believed to have been employed by Reichhold Chemicals, Inc. in the generation, processing, storage and transportation of hazardous wastes or hazardous waste constituents. In particular, Section 7.0 at pages 11 and 12 of the Plan (dated January 10, 1989), stating in part that "...The adjoining areas of the storage areas are not being investigated as part of this closure because an environmental audit of the entire plant area is being conducted..." is entirely unresponsive to the issue, and, if not challenged by the DNR, exposes this community to an unwarranted risk to human health and to the environment, as well as potential gargantuan economic costs to this community, and

IT IS FURTHER RESOLVED, that notwithstanding any possible jurisdictional limitations of the Michigan Department of Natural Resources or

City of Ferndale, Michigan---Resolution Regarding Reichhold Chemicals

of the United States Environmental Protection Agency, these governmental organizations must take immediate action to assure that the public health, safety, and welfare is preserved by causing soil and ground-water sampling to be conducted in areas adjacent to, or in proximity with, the Reichhold complex which might possibly have become contaminated by the transfer of hazardous wastes or hazardous waste constituents through the air, water run-off, or by other means, and

IT IS FURTHER RESOLVED, that the Michigan Department of Natural Resources and the United States Environmental Protection Agency, after conducting an in-depth probe (including an extensive on-site inspection of the subject premises and personal interviews with all individuals who purport to have knowledge of the Reichhold operation over the years), hold another Public Hearing at which not only will public comment be invited but at which representatives of Reichhold Chemical, Inc. will be questioned, and at which the DNR will explain in detail the basis for the contemplated approval or non-approval of the Closure Plan, and

IT IS FURTHER RESOLVED, that a copy of this Resolution be delivered to Mr. Stephen Blayer, Waste Management Division, Michigan Department of Natural Resources, Box 30241, Lansing, Michigan 48909, prior to July 5, 1989 for inclusion in the record of the DNR proceedings involving this Reichhold Chemicals, Inc. site; and that a copies be delivered to Mr. David Hales, Director of the MDNR and to Al Howard, Division Chief, Waste Management Division, MDNR, forthwith.

The resolution being put to vote on roll call, Council voted thereon as follows:

AYES: Councilmen Saunders, Waldick, Lennon; Mayor Pro Tem Poole.

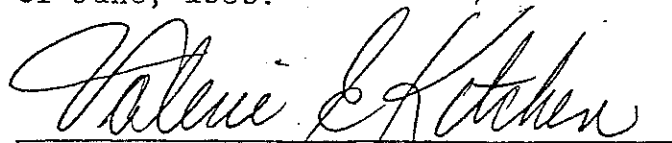
NAYS: None.

ABSENT: Mayor Gertley.

The Mayor Pro Tem thereupon declared such resolution adopted.

I, Valerie E. Kitchen, Clerk of the City of Ferndale, do hereby certify that the foregoing is a true and compared copy of a resolution duly made and passed by the Ferndale City Council at a meeting held June 26, 1989.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the City of Ferndale this 27th day of June, 1989.


City Clerk

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY HANMER
JOHN STEWART WILSON
DAVID R. HALE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STANLEY T. MASON, Director
P.O. BOX 30038
LANSING, MI 48203

DAVID R. HALE, Director

January 19, 1989

Ms. Darlah Munger
Ferndale Public Library
222 East 9 Mile Road
Ferndale, Michigan 48220

Dear Ms. Munger:

Reichhold Chemicals, Inc., located at 601 Woodward Heights Blvd. in Ferndale, Michigan, has submitted a revised closure plan for its hazardous waste storage facility. Submission of this plan is required by the Michigan Hazardous Waste Management Act, 1979 P.A. 64, as amended. Enclosed is a copy of the revised closure plan. Please make the revised closure plan available for public review.

Thank you for your cooperation in this matter. If you have questions regarding the facility or the revised closure plan review process, please contact me.

Sincerely,

Stephen R. Blayer

Stephen R. Blayer
Environmental Engineer
Waste Management Division
517-373-7739

Enclosure

cc: Ms. Marilyn Sabadaszka, U.S. EPA
Mr. Rich Traub, U.S. EPA
Mr. Ken Burda, WMD/C&E File
Dr. Ben Okwumabua, WMD, Detroit
Mr. Alan Howard, WMD

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

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RAYMOND POUPRE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48909

DAVID F. HALES, Director

December 9, 1988

Mr. Joseph Merucci, City Manager
City of Pleasant Ridge
23925 Woodward Avenue
Pleasant Ridge, Michigan 48069

Dear Mr. Merucci:

SUBJECT: Reichhold Chemicals, Inc.
MID 020 087 128
Closure Plan

Mr. Alan J. Howard, Chief of the Waste Management Division, has asked me to respond to your letter dated December 2, 1988, regarding the Reichhold Chemicals, Inc. hazardous waste storage facility closure plan.

We will be holding a public hearing regarding the Reichhold Chemicals closure plan at the City of Ferndale Council Chambers. The public hearing will be held after Reichhold has submitted a revised closure plan (which is due January 3, 1989). This will allow time for both the Waste Management Division and the public to review the plan before the public hearing. We have included your name on the Reichhold Chemicals facility mailing list and will notify you of the date of the public hearing.

Regarding your question on asbestos insulation at the facility, under the Act 64 closure regulations Waste Management Division only has the authority to require the clean-up of hazardous wastes and releases from solid waste management units. Since asbestos insulation is not considered a hazardous waste or a release from a solid waste management unit, Reichhold is not required to address asbestos insulation in its hazardous waste closure plan. However, asbestos insulation removal is regulated under the Federal Clean Air Act National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulations. Questions should be directed to Ms. Karen Kligman of Air Quality Division at 517-373-7023.

EPA

Burda

Y
ER

R-D

9/20/88

Reichhold Chemicals, Inc.
Chemical Coatings Division
601-707 Woodward Heights Boulevard
Ferndale, Michigan 48220

REICHHOLD

September 8, 1988

Mr. Del Rector
Michigan Department of Natural Resources
Box 30028
Lansing, Michigan 48909

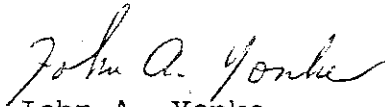
Dear Mr. Rector:

Subject: Reichhold Chemicals, Inc.
Act 64 Operating License Application
MID 020 087 128

Reichhold Chemicals, Inc. is in the process of closing its Ferndale, Michigan facility. Production is scheduled to cease before the end of 1988, with environmental clean-up continuing through the first to second quarter of 1989.

Therefore, in lieu of obtaining a permit, the Closure Plan is submitted together with a Letter of Credit in compliance with financial assurance requirements. Please advise the writer if additional information is required.

Very truly yours,



John A. Yonke
Environmental Manager
313 - 542-0270

JAY:vel
Encl.

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
EPHEN V. MONSMA
J. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

October 28, 1985

Reichhold Chemicals, Inc.
601 Woodward Heights Blvd.
Ferndale, MI 48220
Attn: George Hiduck

RE: MID 020087128

Dear Mr. Hiduck:

A letter was sent to you on June 12, 1985, summarizing the deficiencies found during the review of your closure plan and requesting documentation of correction of these deficiencies by July 8, 1985. To this date, no acceptable response has been received.

You are requested, for a second time, to provide a response to the June 12, 1985, letter by November 15, 1985. Failure to respond by that date will result in further enforcement action.

Please keep in mind that the Resource Conservation and Recovery Act allows a civil penalty of not more than \$25,000 for each day of continued noncompliance.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Damrel".

Kenneth L. Damrel
Environmental Engineer
HAZARDOUS WASTE DIVISION
(313) 459-9180

KD:jg

cc: U.S. EPA, Region V
B. Okwumabua
Company File

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
T. R. CAROLLO
ACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

June 12, 1985

Reichhold Chemicals, Inc.
601 Woodward Heights Blvd.
Ferndale, MI 48220
Attn: George A. Hiduck, Plant Mgr.

RE: MID 020087128

Dear Mr. Hiduck:

The Hazardous Waste Division has received your closure plan for the facility located at the above address. Based on review of the closure plan, the following deficiencies were noted:

1. The expected year of closure is not specified as required by 40 CFR §265.112(a)4.
2. The closure cost estimate does not contain costs for disposal of the 750 gallons of waste that is contained in the storage and mixing tanks, nor for the decontamination of these tanks.
3. The financial assurance mechanism for closure was not provided as required by 40 CFR §265.143.
4. The liability requirements for sudden and non-sudden accidental occurrences as required by 40 CFR §265.147 were not provided.

You are requested to respond to this letter by July 8, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Damrel".

Kenneth L. Damrel
Environmental Engineer
HAZARDOUS WASTE DIVISION

KD:jg

cc: U.S. EPA, Region V
B. Okwumabua

RECEIVED

FEB 25 1985

REICHHOLD®

HAZARDOUS WASTE DIV

CORPORATE HEADQUARTERS: 525 NORTH BROADWAY, WHITE PLAINS, NEW YORK 10603
TELEPHONE: (914) 682-5700 TWX: 7105681373 CABLE: BECKACITE WHITE PLAINS

Address Reply To
601-707 WOODWARD HEIGHTS BLVD.
DETROIT, MICHIGAN 48220
(313) 564-6500

February 13, 1985

Mr. Benedict N. Okwumabua
District Supv. Hazardous Waste Division
Michigan Department of Natural Resources
15500 Sheldon Road
NORTHVILLE, Michigan 48167

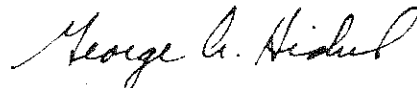
Dear Mr. Okwumabua:

Enclosed are two (2) copies of our Closure and Post-Closure Cost Plan per your request of January 25, 1985.

If you have any questions regarding this information, please contact me at (313) 542-0200.

Very truly yours,

REICHHOLD CHEMICALS, INC.



George A. Hiduk
Plant Manager

GAH/bjh
Encl.

5200 9-1
1000

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

January 23, 1985

Reichhold Chemicals, Inc.
601 Woodward Heights Blvd.
Ferndale, Michigan

RE: MID 020087128

Gentlemen:

As part of our FY85 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all hazardous waste treatment, storage, and disposal facilities (TSDFs) in the state.

Your facility falls under this classification. Therefore, please submit two up-to-date copies of your closure plan for your treatment, storage, and disposal facility by February 15, 1985.

The above should be sent to the following address:

Hazardous Waste Division
Michigan Department of Natural Resources
15500 Sheldon Road
Northville, MI 48167

If you have questions regarding this letter, please contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, reading "Benedict N. Okwumabua".

Benedict N. Okwumabua, PhD.
District Supervisor
Hazardous Waste Division

cc: U.S. EPA
J. Bohunsky
A. Howard



A.4.5

NATURAL RESOURCES
COMMISSION

JERRY C. BARTNIK
LARRY DEVUYST
PAUL EISELE
JAMES HILL
DAVID HOLLI
JOEY M. SPANO
JORDAN B. TATTER

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909

ROLAND HARMES, Director

cc: L. Jodis
J. Haff
compliance
file

October 26, 1994

CERTIFIED MAIL

Mr. John W. Knaub
Reichhold Chemicals, Inc.
P.O. Box 13582
Research Triangle Park, North Carolina 27709

RECEIVED
WMD RECORD CENTER

NOV 29 1994

Dear Mr. Knaub:

SUBJECT: Financial Assurance Cost Estimate
Reichhold Chemicals, Inc. - MID 020 087 128
Ferndale, Oakland County, Michigan
Corrective Action Order (WMD Order No. 64-03-245-01-94)

The Waste Management Division (WMD) of the Michigan Department of Natural Resources (MDNR) has reviewed Reichhold Chemicals, Incorporated's (Reichhold) September 21, 1994 initial financial assurance cost estimate (estimate) for the work to be performed under the subject Corrective Action Order (CAO). The estimate was reviewed for compliance with Section X and Task III.A of Attachment I of the CAO.

Pursuant to this review, the estimate must be revised to provide financial assurance for the additional work required by the WMD's February 4, September 23, and September 30, 1994 comments on Reichhold's August 13, 1993 draft interim measures (IM) and draft RCRA Facility Investigation work plans. In accordance with Section X of the CAO, the estimate may also require a revision as work proceeds on the facility to accurately reflect the costs of investigations. Reichhold must submit a revised estimate within 90 days of receipt of this letter, as required by paragraph 38.A.(ii) of the CAO.

If you have any questions, please contact me. The WMD is willing to discuss these financial assurance cost estimate comments by telephone, or in a meeting.

Sincerely,

Daniel P. Dailey
Hazardous Waste Program Section
Waste Management Division
517-335-6610

cc: Ferndale Public Library
Mr. Joe Merucci, City of Pleasant Ridge
Mr. Jess Soltess, City of Ferndale
Mr. Chuck Goedert, City of Ferndale
Ms. Janet Narich, Fern/Ridge Coalition
Mr. Richard Traub, U.S. EPA
Ms. Lorraine Kosik, U.S. EPA
Mr. Ken Burda/Corrective Action File
Mr. Steve Buda, MDNR
Mr. Larry AuBuchon/Mr. Don Mbamah, MDNR-Livonia
Mr. Dave Slayton, MDNR
Mr. Phil Schrantz, MDNR

RECEIVED
OCT 31 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V



X2: EPA

Reichhold Chemicals, Inc.

Corporate Headquarters
P.O. Box 13582
Research Triangle Park, NC 27709-3582

RECEIVED

OCT 03 1994

**OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V REICHHOLD**

September 21, 1994

Michigan Department of Natural Resources
Waste Management Division
P.O. Box 30241
Lansing, Michigan 48909
Attn: Mr. Daniel Dailey

Subject: Financial Assurance - Corrective Action Consent Order
Ferndale, Michigan Facility

Dear Mr. Dailey:

Enclosed please find the initial cost estimates for the work required by the subject order. The RFI and IM cost estimates are based on the Draft RFI and IM Workplans submitted to the Department in August, 1993. The cost estimate for the CMS is based on O'Brien & Gere's review of Attachment II of the Order. Since the CMS is based on the results of the RFI, it is difficult to be more accurate at this time.

Reichhold would propose to establish the required financial assurance with a letter of credit. The letter of credit will be obtained following the Department's approval of the cost estimates or acceptable revisions to those estimates. Reichhold would propose to incorporate the Department's comments on the RFI and IM Workplans into revised estimates prior to establishing the initial letter of credit.

Please review the attached information and let me know if you have any questions or concerns. Once Reichhold receives approval of the cost estimates, it will take thirty to forty-five days to process the letter of credit through our corporate parent and forward it to you.

Sincerely,



John W. Knaub
Project Coordinator

RECEIVED

SEP 21 1994

Waste Management
Division



O'BRIEN & GERE
ENGINEERS, INC.

Transmittal

Raritan Plaza / Edison, NJ 08837 / (908) 225-7380 FAX (908) 225-7931

To: Mr. John Knaub
Senior Environmental Engineer
REICHHOLD CHEMICALS, INC.
2400 Ellis Road
Durham, NC 27703-5543

Date: September 20, 1994
File: 3208.058 #2
Re: CACO Financial Assurance
Requirements

We are sending you _____ herewith _____ under separate cover
_____ drawings _____ descriptive literature _____ letters

Quan.	Identifying Number	Title	Action*
1		RFI and CMS Cost Estimate Table	Y

*Action lettercode: **R**-reviewed **N**-reviewed and noted **I**-for your information
S-resubmit **J**-rejected **Y**-for your approval

Remarks:

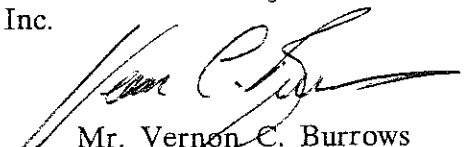
Please find enclosed a cost estimate table for the RFI implementation and CMS. This table was generated to assist RCI regarding the financial assurance requirements of the CACO. If you have any questions or concerns please do not hesitate to call me.

If material received is not as listed, please notify us at once.

cc.

Mr. Donald E. Stone, Jr., P.E., O'Brien & Gere Engineers, Inc.
Mr. Richard P. Cawley, C.P.G., O'Brien & Gere Engineers, Inc.

Very truly yours,
O'Brien & Gere Engineers, Inc.


Mr. Vernon C. Burrows
Sr. Project Hydrogeologist

REICHHOLD CHEMICALS, INC.
Ferndale, Michigan Facility

RFI ENGINEERING SERVICES
COST ESTIMATE

Task	Engineering	Analytical	Drilling	Construction	Total
RFI WP Final	\$45,000	\$0	\$0	\$0	\$45,000
RFI Implementation	\$138,900	\$100,000	\$169,000	\$0	\$407,900
RFI Draft Report	\$60,000	\$0	\$0	\$0	\$60,000
RFI Final Report	\$35,000	\$0	\$0	\$0	\$35,000
Subtotal:					\$547,900
Interim Measures	Engineering	Analytical	Drilling	Construction	Total
DNAPL	\$4,120	*	\$0	\$10,882	\$15,000
SVE	\$18,265	*	\$0	\$23,718	\$41,983
Subtotal:					\$56,983
	Engineering	Analytical	Drilling	Construction	Total
Corrective Measures Study	\$189,000	*	\$0	\$0	\$189,000
Subtotal:					\$189,000
TOTAL:					\$793,883

* Analytical component contained within construction budget.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12

MAR 26 1987

U.S. EPA ID #: MID020087128

REICHHOLD CHEMICALS INC
601 WOODWARD HEIGHTS BLVD
FERNDALE MI 48220

Re: RCRA Financial Responsibility

Dear Owner/Operator:

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for liability coverage and closure/post-closure care.

To implement this aspect of authorization, financial documents must be written to satisfy the requirements of the Michigan Administrative Code 1985 AACs, Part 7, which is the Michigan equivalent of 40 CFR Part 265, Subpart H. This letter is to notify you that your financial test should be updated and sent to the Director of the Michigan Department of Natural Resources within 90 days after the close of your fiscal year.

If you have any questions or desire additional information, please contact Ms. Sharon Johnson at (312) 886-4581 or Ronald Brown at (312) 353-7921.

Sincerely yours,

Wm. E. Muno

William E. Muno, Chief
RCRA Enforcement Section

cc: John Bohunsky, MDNR

Reichhold Chemicals, Inc.

Corporate Headquarters
525 North Broadway
White Plains, New York 10603

REICHHOLD

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

December 18, 1985

Regional Administrator, Region V
Environmental Protection Agency
1 North Wacker Drive
Chicago, Illinois 60606

RECEIVED
JAN 6 1986

JAN 15 1986

SOLID WASTE BRANCH
U.S. EPA. REGION V

EPA REGION 5
OFFICE OF REGIONAL
ADMINISTRATOR

RE: Ferndale, Michigan Plant -EPA I.D. #MID020087128

Gentlemen:

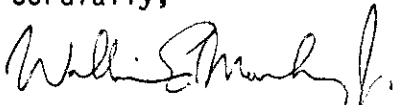
Attached is a letter from our Chief Financial Officer, Jay R. Olson, which we are submitting to update our filing with regard to the subject facility. This letter utilizes the financial test to demonstrate financial assurance for closure of this plant.

In addition, Reichhold Chemicals, Inc. with this letter is using the financial test to demonstrate financial assurance for liability arising out of both sudden and non-sudden occurrences.

We also attach a copy of our 1984 Annual Report and 10-K.

Trust this will satisfy your requirements.

Cordially,



William E. Markey, Jr.
Director of Risk Management

WEM:mcc
Att:

cc: Messrs. A. F. Vicker
G. Hiduk

JAN 07 1986

SOLID WASTE BRANCH
U.S. EPA. REGION V

O. WMD
cc: RF

REICHOLD CHEMICALS, INC.

Creative Chemistry . . . Your Partner in Progress



World Headquarters • RCI BUILDING, WHITE PLAINS, N. Y. 10603

CABLE: BECKACITE WHITE PLAINS
TELEPHONE: 914-682-5700
TWX: 7105681373

July 14, 1982

United States Environmental Protection Agency
Federal Building
230 South Dearborn
Chicago, Ill. 60604

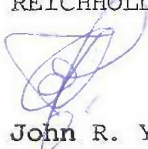
Re: Ferndale - MID020087128
Morris - ILD0050932144

Gentlemen:

Enclosed herewith is an endorsement to our liability policy covering sudden and accidental occurrences as outlined in the Resource Conservation and Recovery Act.

Very truly yours,

REICHOLD CHEMICALS, INC.


John R. Young
Assistant Treasurer

JRY/gg
Enclosure

REGISTERED RECEIPT REQUIRED



Peat, Marwick, Mitchell & Co.

Certified Public Accountants

South Tower Building
White Plains Plaza
White Plains, New York 10601

July 2, 1982

Board of Directors
Reichhold Chemicals, Inc.

We have examined the consolidated financial statements of Reichhold Chemicals, Inc. and consolidated subsidiaries as of and for the year ended December 31, 1981 and have issued our report thereon dated February 5, 1982. We did not perform audit tests for the purpose of expressing an opinion on the individual amounts such as those enumerated below, and, accordingly, we express no opinion thereon.

We have applied certain agreed-upon procedures (as discussed below) to certain specified amounts included in the letter dated July 1, 1982 from J. Janos (Vice President - Finance) to the Environmental Protection Agency (EPA), solely to assist Reichhold Chemicals, Inc. (The Company) in its reporting requirements to the EPA. It is understood that this report is to be used solely for this purpose, and is not to be referred to or distributed to anyone else or for any other purpose. Our procedures and findings are as follows:

- a. We compared the dollar amounts of "Total liabilities", "Current assets", "Current liabilities", "Tangible net worth", and "Net worth", listed in the letter, to the corresponding amounts in the consolidated financial statements included in the Company's 1981 annual report to stockholders and found them to be in agreement.
- b. We totalled the assets at December 31, 1981 of Reichhold Chemicals, Inc. (unconsolidated), Reichhold Energy Corporation, The Reichhold DISC, and Reichhold Motor Leasing; these assets represent the Company's U.S. assets, and were traced to their respective general ledgers and to consolidating worksheets supplied to us from the Company. From this total (\$374,637,000), we subtracted inter-company domestic investments and intercompany receivables per the Company's general ledgers. This net number (\$367,143,000), which represents total net assets in the U.S., agrees with the same caption as listed in the letter.

Because the above procedures do not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the accounts or items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified accounts or items should be adjusted. Had we performed additional procedures, matters might have come to our attention that would have been reported to you. This report relates only to the accounts and items specified above.

Peat, Marwick, Mitchell & Co.

REICHOLD CHEMICALS, INC.

Creative Chemistry... Your Partner in Progress



World Headquarters • RCI BUILDING, WHITE PLAINS, N. Y. 10603

CABLE: BECKACITE WHITE PLAINS
TELEPHONE: 914-682-5700
TWX: 7105681373

July 1, 1982

USEPA Regional Offices
Federal Building
230 South Dearborn
Chicago, Ill. 60604

Gentlemen:

I am the Chief Financial Officer of Reichold Chemicals, Inc. This letter is in support of this firm's use of the financial test to demonstrate financial assurance as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or postclosure cost estimates covered by the test are shown for each facility: (See schedule attached)
2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or postclosure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or postclosure care so guaranteed are shown for each facility: NONE
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or postclosure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: NONE
4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31st. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

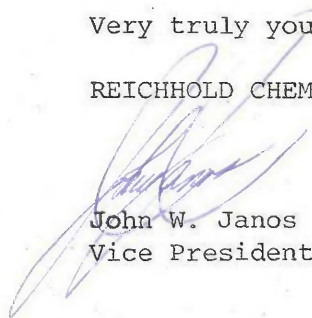
ALTERNATIVE I

1. Sum of current closure and post-closure cost estimates	\$ <u>932,617</u>																				
*2. Total liabilities	<u>198,750,000</u>																				
*3. Tangible net worth	<u>206,727,000</u>																				
*4. Net worth	<u>209,831,000</u>																				
*5. Current assets	<u>219,658,000</u>																				
*6. Current liabilities	<u>89,843,000</u>																				
7. Net working capital	<u>129,815,000</u>																				
8. The sum of net income plus depreciation, depletion, and amortization	<u>35,550,000</u>																				
*9. Total assets in U.S.	<u>\$367,143,000</u>																				
10. Is line 3 at least \$10 million	<table border="1"><thead><tr><th>Yes</th><th>No</th></tr></thead><tbody><tr><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><input type="checkbox"/></td><td><input checked="" type="checkbox"/></td></tr><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr></tbody></table>	Yes	No	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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11. Is line 3 at least 6 times line 1?	<input checked="" type="checkbox"/>																				
12. Is line 7 at least 6 times line 1?	<input checked="" type="checkbox"/>																				
13. Are at least 90% of firm's assets located in the U.S.?	<input checked="" type="checkbox"/>																				
If not, complete line 14.																					
14. Is line 9 at least 6 times line 1?	<input checked="" type="checkbox"/>																				
15. Is line 2 divided by line 4 less than 2.0?	<input checked="" type="checkbox"/>																				
16. Is line 8 divided by line 2 greater than 0.1?	<input checked="" type="checkbox"/>																				
17. Is line 5 divided by line 6 greater than 1.5?	<input checked="" type="checkbox"/>																				

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

REICHHOLD CHEMICALS, INC.


John W. Janos
Vice President-Finance

JWJ/gg

ATTACHMENT I

<u>EPA REGION</u>	<u>RCI LOCATION</u>	<u>EPA IDENTIFICATION NO.</u>	<u>CLOSURE COST ESTIMATE</u>
REGION I	ANDOVER	MAD001000165	30,000
REGION II	CARTERET	NJD002520021	25,800
	ELIZABETH	NJD002202869	628,000
	NIAGARA FALLS	NYD002103216	4,286
	STERLING FOREST	NYD011311881	1,000
REGION III	SEWICKLEY	PAD004334140	30,000
REGION IV	GULFPORT	MSD001661719	14,000
	GRAND JUNCTION	TND003913472	5,000
	TUSCALOOSA	ALD004002838	7,250
REGION V	FERNDALE	MID020087128	50,275
	MORRIS	ILD0050932144	19,256
REGION VI	HOUSTON	TXD008063398	26,000
REGION IX	SO. SAN FRANCISCO	CAD009141946	20,000
	VISALIA	CAD050344910	25,000
REGION X	TACOMA	WAD009252891	46,750
			932,617

ATTACHMENT II

ADDRESSES USEPA REGIONAL OFFICES

REGION I	Room 2203 John F. Kennedy Federal Bldg. Boston, Mass. 02203
REGION II	Room 1009 26 Federal Plaza New York, New York 10007
REGION III	Curtis Building 6th and Walnut Streets Philadelphia, Pa. 19106
REGION IV	345 Courtland Street N.E. Atlanta, Ga. 30308
REGION V	Federal Building 230 South Dearborn Chicago, Ill. 60604
REGION VI	First International Bldg. 1201 Elm Street Dallas, Tx. 75270
REGION IX	215 Fremont Street San Francisco, Calif. 94105
REGION X	1200 6th Avenue Seattle, Wash. 98101



HAZARDOUS WASTE FACILITY CERTIFICATE OF INSURANCE

THE HARTFORD

1. The Hartford Fire Insurance Company, (the Insurer) of Hartford Plaza, Hartford, Connecticut 06115 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Reichhold Chemicals Inc., (the insured) of 525 North Broadway, White Plains, NY 10603 in connection with the insured's obligation to demonstrate financial responsibility tender 40 CFR 264.147 or 265.147. The coverage applies at:

EPA Identification Number: See Over

Name: See Over

Address: See Over

for sudden and accidental occurrences. The limits of liability are \$ See Over each occurrence and \$ See Over annual aggregate, exclusive of legal defense costs.

The coverage is provided under Policy Number 10 CLR B34072W, issued on July 15, 1982. The effective date of said policy is January 1, 1982.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer or the insured will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.



HAZARDOUS WASTE FACILITY CERTIFICATE OF INSURANCE

THE HARTFORD

1. The Hartford Fire Insurance Company, (the Insurer) of Hartford Plaza, Hartford, Connecticut 06115 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Reichhold Chemicals Inc., (the insured) of 525 North Broadway, White Plains, NY 10603 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

EPA Identification Number: See Over

Name: See Over

Address: See Over

for sudden and accidental occurrences. The limits of liability are \$ See Over each occurrence and \$ See Over annual aggregate, exclusive of legal defense costs.

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 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer or the insured will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

123 William Street
New York, New York 10038
Telephone: (212) 553-8000



September 29, 1982

Regional Administrator
United States Environmental Protection Agency
Federal Building
230 South Dearborn
Chicago, IL 60604

Re: Reichhold Chemicals, Inc.
Hazardous Waste Facility Certificate of Insurance

Dear Sir:

The attached Hazardous Waste Facility Certificate of Insurance cancels and supercedes the previous Amendatory Endorsement Pollution Liability filing made for the above captioned insured.

A Certificate of Insurance is included for each applicable facility in Region V.

Very truly yours,

Norma Marshall, Account Executive
Hartford Specialty Company

NM:mml-2
0834A

MANDATORY ENDORSEMENT POLLUTION LIABILITY



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following

COMPREHENSIVE GENERAL LIABILITY INSURANCE
COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE
SMP LIABILITY INSURANCE

Premium for This Endorsement Subject to Audit

Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that: the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number. MID 020087128
Name: Reichhold Chemicals, Inc.
Address: 601-707 Woodward Heights Blvd., Ferndale, Michigan 48220
for sudden accidental occurrences. The limits of liability are \$1,000,000
"each occurrence" and \$2,000,000 annual aggregate, exclusive of legal defense costs.
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
(d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
(e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

Attached to and forming part of Policy No. 10 CLR B34072W, herein called the Insurer,
issued by Hartford Fire Insurance Company
of Hartford Plaza Hartford, Conn. to Reichhold Chemicals, Inc. (Name of Insured)
(Address of Insurer)
525 North Broadway White Plains, NY 10603

this 15th day of July, 19 82. The effective date of said policy is
1st day of January, 19 82.